

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION**

CAROLENG INVESTMENTS LIMITED,

Petitioner,

v.

BLUESTONE RESOURCES, INC.,

Respondent.

Index No. 7:23-cv-10010-RSB

**JOINT STIPULATION**

Petitioner and judgment creditor Caroleng Investments Limited (“Petitioner” or “Judgment Creditor” or “Caroleng”), along with Respondent and judgment debtor Bluestone Resources, Inc. (the “Respondent” or “Judgment Debtor” or “Bluestone”, and together with Caroleng, the “Parties”), and nonparty 1st Source Bank (“1st Source”), each by and through counsel, hereby enter into this Joint Stipulation (the “Stipulation”) regarding the details of the helicopter owned by Bluestone, subject to the Writ of this Court:

WHEREAS multiple pleadings in the instant action make reference to a Bell Helicopter Textron Canada Model 427 (the “Helicopter”), property of the Judgment Debtor, including:

1. *Application for Writ of Execution* (Dkt. 5);
2. *Writ of Execution* (Dkt. 6) and *Supplemental Writ* (Dkt. 11);
3. Respondent’s *Motion to Stay Supplemental Writ of Execution* (Dkt. 13);
4. *Petitioners Opposition to Motion to Stay Supplemental Writ of Execution* (Dkt. 14);
5. *Affidavit of Zachary E. Mazur, Esq. in Opposition to Motion to Stay Supplemental Writ of Execution* (Dkt. 15);

6. *Third Party 1<sup>st</sup> Source Bank's (1) Joinder to Defendant's Motion for Stay; and (2) Response to Plaintiff's Application for Writ of Execution (Dkt. 17);*
7. *Order Staying Supplemental Writ of Execution Issued (Dkt. 18);*
8. *Petitioners Response to 1<sup>st</sup> Source Bank's Joinder to the Motion to Stay Supplemental Writ of Execution (Dkt. 20);*
9. *Third Party 1<sup>st</sup> Source Bank's Reply to Petitioners Response to 1<sup>st</sup> Source Bank's Joinder to the Motion to Stay Supplemental Writ of Execution (Dkt. 21);*

WHEREAS, as observed by the Court, the above referenced pleadings and their respective exhibits (the "Pleadings") have used varying identifiers to said helicopter, alternatively identifying its year of manufacture as 2009 or 2012, and with varying serial numbers and FAA tail numbers;

WHEREAS, although the Parties and 1st Source bank may disagree as to the enforceability of Caroleng's judgment, and as to the extent and the enforceability of 1<sup>st</sup> Source Bank purported security interest in the helicopter, with arguments that are better detailed in their respective pleadings, the Parties and 1<sup>st</sup> Source Bank wish to stipulate that they are all referring to the same specific aircraft;

IT IS THEREFORS HEREBY STIPULATED AND AGREED by the Parties and by 1<sup>st</sup> Source Bank, by and through their respective undersigned counsel, who have full authority to bind them, that, the Helicopter, property of Bluestone, at the center of the enforcement dispute in the Pleadings, shall refer to the:

2009 Bell Helicopter Textron Canada Model 427, Serial No. 56079 FAA registration number N375JC, including all logs and records, all accessories, attachments, parts, repairs, additions, accessions, substitutions, exchanges relating to the helicopter.

Dated: January 8, 2024  
Roanoke, Virginia

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**CERTIFICATION OF SERVICE**

I certify that, on the 8<sup>h</sup> of January 2024, I electronically filed the foregoing with the Court's ECF system, providing electronic service via counsel of record to all parties in this case.

/s/ Zachary Mazur